

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268

POST OFFICE STRUCTURE PLAN

Docket No. N2012-2

**UNITED STATES POSTAL SERVICE RESPONSES TO DAVID B. POPKIN
INTERROGATORIES (DBP/USPS-15—25)**
(June 27, 2012)

The United States Postal Service today files its institutional responses to the above-identified interrogatories of David B. Popkin, dated June 20, 2012. Each interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE
By its attorneys:

Anthony F. Alverno
Chief Counsel
Global Business & Service Development

Caroline R. Brownlie
Adriene M. Davis
James M. Mecone

475 L'Enfant Plaza, S.W.
Washington, D.C. 20260
(202) 268-6525; Fax -5402

**UNITED STATES POSTAL SERVICE
RESPONSE TO DAVID B. POPKIN INTERROGATORY**

DBP/USPS-15.

Please refer to your response to Interrogatory DBP/USPS-1.

[a] Please confirm, or explain, that Library Reference USPS-LR-N2012-2/1 contains all of the post offices being considered in this Docket.

[b] Please advise the approximate percentage of the total number of post offices that this represents.

[c] Please confirm, or explain, that Library Reference USPS-LR-N2012-2/2 collectively contains all of the post offices in the country.

RESPONSE

[a] Confirmed.

[b] See footnote 1 and page 2 of the Direct Testimony of Jeffrey C. Day on Behalf of the United States Postal Service (USPS-T-1).

[c] Confirmed. Library Reference USPS-LR-N2012-2/2 includes Post Offices and other Postal Service-operated retail facilities.

**UNITED STATES POSTAL SERVICE
RESPONSE TO DAVID B. POPKIN INTERROGATORY**

DBP/USPS-16.

Please refer to your response to Interrogatory DBP/USPS-2.

If a customer has a complaint regarding the service being conducted at an RMPO or PTPO, how will they know the location of the responsible Postmaster at the APO?

RESPONSE

Consistent with the procedures in place today, Postal Service customers will have the ability to submit a complaint by contacting the Postal Service at 1-800-ASK-USPS® (800-275-8777).

**UNITED STATES POSTAL SERVICE
RESPONSE TO DAVID B. POPKIN INTERROGATORY**

DBP/USPS-17.

Please refer to your response to Interrogatory DBP/USPS-4.

Please provide any insight, if there is any, that an individual responding to the survey and who fully understood the survey responses could have a rational reason as to why it would be a better choice to have an office close and provide no service in any given area then it would be to maintain some level of service in that area.

RESPONSE

The Postal Service has no information responsive to this interrogatory.

**UNITED STATES POSTAL SERVICE
RESPONSE TO DAVID B. POPKIN INTERROGATORY**

DBP/USPS-18.

Please refer to your response to Interrogatory DBP/USPS-6.

I realize that larger offices – Level 18 and above – are not covered in this proceeding. However, if similar activity as being proposed in this Docket has already been conducted in these larger offices, I would like to pursue the experience that was learned in that activity. Please respond to the original Interrogatory.

RESPONSE

The Postal Service responded to interrogatory DBP/USPS-6 on June 7, 2012. It has no additional information that is responsive to this interrogatory, and has not applied the POStPlan concept to Post Offices classified at EAS Level 18 or above.

**UNITED STATES POSTAL SERVICE
RESPONSE TO DAVID B. POPKIN INTERROGATORY**

DBP/USPS-19.

Please refer to your response to Interrogatory DBP/USPS-8.

Your response does not seem logical. If an office is now open for the better part of the business day and a collection is made towards the end of that time, if that office is now open for fewer hours during the day and those hours are made earlier in the day, who will make the collection of the blue collection box?

RESPONSE

Employees other than postmasters who work within the Administrative Post Office reporting structure of a particular Post Office, including Highway Contract Route carriers, will continue to be available to perform responsibilities associated with collection.

**UNITED STATES POSTAL SERVICE
RESPONSE TO DAVID B. POPKIN INTERROGATORY**

DBP/USPS-20.

Please refer to your response to Interrogatory DBP/USPS-9 subpart [a].

Your response does not seem logical. If an office is now open for the better part of the business day and a dispatch is made towards the end of that time, if that office is now open for fewer hours during the day and those hours are made earlier in the day, who will make the dispatch of the mail?

RESPONSE

Currently, Postal Service retail facilities have retail window service hours that end before dispatch times. The Postal Service will apply its current practices regarding after hours dispatch to any Post Office that faces the situation described in this interrogatory as a result of POStPlan. Employees other than postmasters who work within the Administrative Post Office reporting structure of a particular Post Office, including Highway Contract Route carriers, will continue to be available to perform responsibilities associated with dispatch.

**UNITED STATES POSTAL SERVICE
RESPONSE TO DAVID B. POPKIN INTERROGATORY**

DBP/USPS-21.

Please refer to your response to Interrogatory DBP/USPS-9 subpart [b].

Your response does not seem logical. If an office is now open for the better part of the business day and a dispatch is made towards the end of that time, if that office is now open for fewer hours during the day and those hours are made earlier in the day, who will make the dispatch of the mail that the carrier collected along their route?

RESPONSE

See the response to DBP/USPS-20 above.

**UNITED STATES POSTAL SERVICE
RESPONSE TO DAVID B. POPKIN INTERROGATORY**

DBP/USPS-22.

Please refer to your response to Interrogatory DBP/USPS-10.

[a] Please confirm or explain that some of the offices being covered by this Docket provide access to post office boxes only at times when there is an employee on duty.

[b] If so, how will these customers have the same access to their post office boxes if the hours of service are reduced?

RESPONSE

[a] Confirmed.

[b] The Postal Service intends to make changes to Post Office Box lobbies or identify other solutions where necessary to allow customer access to delivery receptacles for at least the same period as available today.

**UNITED STATES POSTAL SERVICE
RESPONSE TO DAVID B. POPKIN INTERROGATORY**

DBP/USPS-23.

Please refer to your response to Interrogatory DBP/USPS-11.

Please advise the options that customers may receive accountable or oversized mail that do not involve pick-up at a Post Office retail window.

RESPONSE

Please see the forthcoming response to question 6 of Presiding Officer's Information

Request No. 3.

**UNITED STATES POSTAL SERVICE
RESPONSE TO DAVID B. POPKIN INTERROGATORY**

DBP/USPS-24.

Please refer to your response to Interrogatory DBP/USPS-13.

If an affected office reduces its hours and they are made in the late afternoon, who will be available at the office to sort the mail for the carriers to deliver?

RESPONSE

This interrogatory assumes that carriers will be in the POStPlan offices. To the extent possible, carriers will be assigned to an office without reduced hours, such as an APO.

In those instances where the carrier is assigned to an RMPO or PTPO, the employee staffing the office will sort the mail during the Post Office's retail hours of operation.

Such instances provide an example of when the Postal Service will have to consider operational needs (namely, the employee's availability to sort mail), in addition to customer feedback, when determining the daily hours in which window service will be provided at that particular Post Office.

**UNITED STATES POSTAL SERVICE
RESPONSE TO DAVID B. POPKIN INTERROGATORY**

DBP/USPS-25.

[a] How will this Docket affect the box up time for post office box mail?

[b] If the activity level during the reduced window hours is now increased, what effect will that have on the box up time?

RESPONSE

[a] Box up time will take place during each Post Office's retail hours of operation.

Communities will be aware of this factor when providing feedback regarding the daily hours in which window service will be provided at their Post Offices.

[b] Please see page 16 of the Direct Testimony of Jeffrey C. Day on behalf of the United States Postal Service (USPS-T-1). The Postal Service will review the AEWL for all Level 2, 4, and 6 RMPOs and PTPOs on an annual basis that could result in reclassification of certain Post Offices. Increased activity at those Post Offices will be accounted for accordingly.